IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WRS, INC., d/b/a WRS MOTION PICTURE LABORATORIES, a corporation,	)	C.A. No. 00-2041
	)	Judge William L. Standish
Plaintiff,	)	
v.	)	**ELECTRONICALLY FILED**
PLAZA ENTERTAINMENT, INC., a corporation, ERIC PARKINSON, an individual, CHARLES von BERNUTH, an individual and JOHN HERKLOTZ, an individual,	)	
Defendants.	)	

STATEMENT PURSUANT TO LOCAL RULE 37.1

As indicated in the Motion to Compel Discovery that I filed on behalf of Defendant, John Herklotz, I have made a reasonable effort, through telephone calls and letters, to reach agreement with opposing counsel on the subject matter raised by the Motion to Compel Discovery.

Respectfully submitted,

BURNS, WHITE & HICKTON, LLC

By: *John P. Sieminski*

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within **Statement Pursuant to Local Rule 37.1** was served on counsel listed below electronic mail this 4th day of November, 2005:

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